

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

In re:	:	
Nelson Martinez	:	CHAPTER 13
Debtor	:	
 :		
U.S. BANK NATIONAL ASSOCIATION	:	
FOR THE PENNSLYVANIA HOUSING	:	BANKRUPTCY NO.: 15-18073-JKF
FINANCE AGENCY	:	
Movant	:	
 v.		
Nelson Martinez	:	
And	:	
William C. Miller, Esq	:	
Respondents	:	

---

**DEBTOR'S OBJECTION TO MOVANT'S MOTION FOR  
RELIEF FROM THE AUTOMATIC STAY UNDER § 362(d)**

Debtor, by his attorney, Erik B. Jensen, Esq. by way of answer to Movant's motion, respectfully represent that:

- 1.- 5. Admitted.
- 6.- 8. Denied. Movant states a conclusion of law to which no response is required.
9. Denied. Debtor intends to cure all arrears owed.
- 10-11. Denied. Movant states a conclusion of law to which no response is required.

WHEREFORE, Debtor prays that Movant's request be denied.

Date: August 22, 2016

Respectfully submitted.

/S/ Erik B. Jensen  
Erik B. Jensen, Esq.